

Exhibit E

From: Chang, Cheryl S.
Sent: Monday, January 11, 2021 1:39 AM
To: sandy@saalimited.com
Cc: Metral, Nicole; Harris Powers; No, Hannah; McElroy, Jessica
Subject: RE: Depositions

Ms. Goulette,

While you reached out to us after we already completed preparing the motion to compel and seek sanctions against you, we will delay filing it based on your representation that you will appear at, and sit through the remainder of your deposition until it is completed. Contrary to your representation that you were “under the impression that the deposition had ended,” I specifically stated on the record that we would be taking a 20 minute break until 4pm CT, and you agreed to that duration for a break. In fact, you left your Zoom link live and video of your office continued to remain on. The word “break” is in the deposition transcript, and the video of your deposition.

Further, even if you had some unexplained misunderstanding of the word “break,” when you did not return, we waited on Zoom for you for over an hour until after 5pm CT. During this time, we called your cell phone at least four times (at the cell phone number you had been using to communicate with our office for the entire day). We also sent you at least three emails. You did not respond to the calls or the emails, and the email from you below is the first we have heard from you in over a month.

That said, since you have agreed to continue your deposition, we will give you one more opportunity to appear and comply with the deposition notice, before we file the motion and seek sanctions. Please confirm if you are available to sit for your deposition on any one of these days: January 13, 15, 20, 21, 28, and 29. Please confirm the date and time by no later than 6:00 PM CT on Monday, January 11, 2021. If we do not hear from you by then, we will file the motion.

Thank you,
Cheryl

Cheryl S. Chang | Blank Rome LLP
2029 Century Park East | 6th Floor | Los Angeles, CA 90067
O: 424.239.3472 | F: 424.239.3478 | chang@blankrome.com

-----Original Message-----

From: sandy@saalimited.com <sandy@saalimited.com>
Sent: Friday, January 8, 2021 10:37 PM
To: Chang, Cheryl S. <Chang@BlankRome.com>
Subject: Re: Depositions
Importance: High

Dear Ms. Cheryl:

Many apologies, however; I was under the impression that the deposition had ended. I do not recall any word about a "break."

Please go ahead and let me know when we can proceed and I will make myself available.

I was quite ill for the days upcoming to the deposition and on a few antibiotics. I may have misunderstood as I am not used to taking any sort of medication.

I am more than willing to assist.

Looking forward to hearing from you.

Sandy

On 2021-01-06 10:59, Chang, Cheryl S. wrote:

> Ms. Goulette,
>
> It has now been nearly a month since you abruptly terminated your
> deposition, without any notice to us, by leaving your office during
> the deposition while we were on a short break and failing to return to
> your office where the computer was for your remote deposition. We
> never received any response from you to our emails and phone calls
> about rescheduling your deposition. If we do not hear from you by
> close of business on Thursday, January 7, 2020, we will move to compel
> your deposition and seek all appropriate sanctions.
>
> We look forward to hearing from you.
>
> Thank you,
>
> Cheryl
>
> Cheryl S. Chang | Blank Rome LLP
> 2029 Century Park East | 6th Floor | Los Angeles, CA 90067
> O: 424.239.3472 | F: 424.239.3478 | chang@blankrome.com -----Original
> Message-----
> From: Chang, Cheryl S.
> Sent: Tuesday, December 8, 2020 3:06 PM
> To: 'sandy@saalimited.com' <sandy@saalimited.com>
> Cc: Metral, Nicole <NBMetral@BlankRome.com>; 'Harris Powers'
> <hpowers@upshawwilliams.com>; McElroy, Jessica
> <JMMcElroy@BlankRome.com>
> Subject: RE: Depositions
>
> Ms. Goulette,
>
> It is now 3pm PT/5pm CT, and it has been nearly an hour and a half
> since we took a break. We have not been able to reach you. I've
> called you twice and left voicemails and Ms. Metral has called and
> left you a voicemail as well. Since it appears you are not rejoining
> the deposition today, we will suspend the deposition for now and put
> on the record that you did not return. And we will coordinate with
> you to continue the deposition to another date. Please advise as soon
> as possible when you are available this month to start your deposition
> again.
>
> Thanks,
> Cheryl
>
> Cheryl S. Chang | Blank Rome LLP
> 2029 Century Park East | 6th Floor | Los Angeles, CA 90067
> O: 424.239.3472 | F: 424.239.3478 | chang@blankrome.com -----Original
> Message-----

> From: Chang, Cheryl S.
> Sent: Tuesday, December 8, 2020 2:47 PM
> To: 'sandy@saalimited.com' <sandy@saalimited.com>
> Cc: Metral, Nicole <NBMetral@BlankRome.com>; 'Harris Powers'
> <hpowers@upshawwilliams.com>; McElroy, Jessica
> <JMcElroy@BlankRome.com>
> Subject: RE: Depositions
> Importance: High
>
> Ms. Goulette,
>
> It's been over an hour since we went on break. Can you let us know if
> you are ok and are able to come back to the Zoom deposition? We were
> scheduled to reconvene at 2pm PT/4pm CT.
>
> I've left two voicemails on your cell but have not been able to reach
> you.
>
> Thanks,
> Cheryl
>
> Cheryl S. Chang | Blank Rome LLP
> 2029 Century Park East | 6th Floor | Los Angeles, CA 90067
> O: 424.239.3472 | F: 424.239.3478 | chang@blankrome.com -----Original
> Message-----
> From: Chang, Cheryl S.
> Sent: Tuesday, December 8, 2020 2:18 PM
> To: 'sandy@saalimited.com' <sandy@saalimited.com>
> Cc: Metral, Nicole <NBMetral@BlankRome.com>; Harris Powers
> <hpowers@upshawwilliams.com>; McElroy, Jessica
> <JMcElroy@BlankRome.com>
> Subject: RE: Depositions
>
> Ms. Goulette,
>
> Mr. Powers, the court reporter, the videographer and I are all ready
> and waiting for you to begin the deposition again. Please join us on
> Zoom as soon as you can.
>
> Thank you,
> Cheryl
>
> Cheryl S. Chang | Blank Rome LLP
> 2029 Century Park East | 6th Floor | Los Angeles, CA 90067
> O: 424.239.3472 | F: 424.239.3478 | chang@blankrome.com
>

> -----Original Message-----

> From: sandy@saalimited.com <sandy@saalimited.com>

> Sent: Tuesday, December 8, 2020 8:37 AM

> To: Metral, Nicole <NBMetral@BlankRome.com>

> Subject: Re: Depositions

>

>

>

> Dear Ms Metral:

> I will be in attendance today for the deposition and I agree to accept

> electronic service to amend the new time and date of the proceeding.

> I will go to the veritext.com site now and log in to make the

> arrangements.

> In regard to your second questions, I do not have an email address

> for Mr. Moffett outside of his SAA email and he has not utilized that

> for the past year to the best of my knowledge. Therefore, I do

> apologize but I do not speak to him and I do not have any access as

> to how to reach him via email. Looking in my cell phone, I do have a

> number for him, however; I am not aware if it is still functional as I

> have not made any attempts to contact him. I will be more than happy

> to give that you you if you think that it may help. The number for

> Mr. Moffett is 601-580-1733

>

> A do apologize that I am not able to supply you with more information,

> however; I do home this this will help you.

> Talk Soon

> Sandra Goulette

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